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 Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

JULIE LYNN FRY,)	
)	
Plaintiff,)	CASE NO.
)	2:23-cv-00891-RFB-VCF
v.)	
)	UNOPPOSED MOTION
)	FOR EXTENSION OF TIME TO FILE
KILOLO KIJAKAZI, ACTING)	PLAINTIFF'S BRIEF
COMMISSIONER OF SOCIAL SECURITY,)	
)	
Defendant.)	
_____)	

Plaintiff, Julie Lynn Fry, by her attorney, moves for a sixty (60) day extension of time to file Plaintiff's opening brief. Plaintiff's opening brief is currently due to be filed October 16, 2023.

Counsel requests this extension due to multiple, simultaneous filing deadlines. Counsel requires additional time to properly and thoroughly prepare Plaintiff's brief. For instance, between October 6, and December 8, 2023, staff in Counsel's office have one hundred and ninety (190) Plaintiff briefs due. This figure does not include oral arguments, appeals to Circuit Courts, Reply Briefs, settlement negotiations, and the various other tasks which arise throughout the course of litigation. These circumstances do not allow for Plaintiff's Counsel to properly

1 prepare the brief by the current deadline. This request will not cause Defendant any undue
2 hardship. This extension is needed to thoroughly and properly prepare the brief.

3 Wherefore, Plaintiff requests an extension from October 16, 2023, up to and including
4 December 15, 2023 to file her brief. Counsel for the Plaintiff has conferred with Defendant's
5 Counsel who kindly has no objection to this request.

6 Dated October 10, 2023.

7 Respectfully submitted,


8 /s/Hal Taylor
9 Hal Taylor, Esq.

10 **Plaintiff's Certificate of Service:**

11 I certify that I caused the Unopposed Motion for Extension of Time to be served today,
12 October 10, 2023, by CMECF to Blaine T. Welsh, Esq., and Franco Becia, Esq., who are filing
13 users of the CM/ECF system.

14 /s/Hal Taylor
15 Hal Taylor

16 IT IS SO ORDERED.

17 
18 _____
19 Cam Ferenbach
20 United States Magistrate Judge

21 DATED 10-12-2023